

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

-v-

WAYFARER STUDIOS LLC, JUSTIN
BALDONI, JAMEY HEATH, STEVE
SAROWITZ, IT ENDS WITH US MOVIE LLC,
MELISSA NATHAN, THE AGENCY GROUP PR
LLC, JENNIFER ABEL, JED WALLACE, and
STREET RELATIONS INC.,

Defendants.

Case No. 1:24-cv-10049-LJL
(consolidated with 1:25-cv-00449-LJL)

WAYFARER STUDIOS LLC, JUSTIN
BALDONI, JAMEY HEATH, IT ENDS WITH US
MOVIE LLC, MELISSA NATHAN, JENNIFER
ABEL, and STEVE SAROWITZ,

Consolidated Plaintiffs,

-v-

BLAKE LIVELY, RYAN REYNOLDS, LESLIE
SLOANE, VISION PR, INC., and THE NEW
YORK TIMES COMPANY.

Consolidated Defendants.

DECLARATION OF ESRA HUDSON
IN SUPPORT OF OPPOSITION TO THIRD-PARTY PEREZ HILTON'S MOTION FOR
PROTECTIVE ORDER AND CROSS MOTION TO COMPEL

I, Esra Hudson, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice before this Court, a partner in the law firm of Manatt, Phelps & Phillips, LLP, 2049 Century Park East, Suite 1700, Los Angeles, CA 90067 and counsel of record for Plaintiff Blake Lively in the above-captioned action.

2. I respectfully submit this declaration in support of Ms. Lively's Opposition to Third-Party Perez Hilton's Motion for Protective Order and Cross Motion to Compel (ECF No. 510 (the "Motion")).

3. A true and correct copy the July 19, 2025 subpoena served on Perez Hilton ("Mr. Hilton") is attached hereto as Exhibit A.

4. A true and correct copy of a screenshot of Mr. Hilton's YouTube post entitled "Welcome to My Channel" is attached hereto as Exhibit B.

5. A true and correct copy of a screenshot of Mr. Hilton's Instagram account with the username "theperezhilton" is attached hereto as Exhibit C.

6. A true and correct copy of the "About Perez Hilton" page from Mr. Hilton's website, perezhilton.com, is attached hereto as Exhibit D.

7. A true and correct copy of a screenshot of Mr. Hilton's X account with the username "@ThePerezHilton" is attached hereto as Exhibit E.

8. A true and correct copy of a document produced in this case bearing the bates number NATHAN_00000876 is attached hereto as Exhibit F.

9. A true and correct copy of the July 1, 2025 service email of the Notice of Intent to Serve Subpoena – Mario Lavandeira (Perez Hilton) to the Wayfarer Defendants is attached hereto as Exhibit G.

10. A true and correct copy of the July 19, 2025 email from Mr. Hilton accepting service of the subpoena is attached hereto as Exhibit H.

11. A true and correct copy of the August 2, 2025 email from Mr. Hilton serving his Motion to Quash filed in the United States District Court for the District of Nevada is attached hereto as Exhibit I.

12. A true and correct copy of the August 2, 2025 Notice of Motion to Quash Subpoena Filed in the District of Nevada filed by Mr. Hilton in this Court is attached hereto as Exhibit J.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: August 5, 2025

/s/ Esra Hudson

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